



February 26, 2007

Naturally Raised Marketing Claim
Agricultural Marketing Services
United States Department of Agriculture
Room 2607-S
1400 Independence Avenue SW
Washington, DC 20250-0254

To Whom It May Concern:

This letter will serve to present Hain Pure Protein Corporation's input regarding the Naturally Raised Marketing Claim Listening Session that was held in Washington, DC on Monday, December 11, 2006.

Hain Pure Protein is one of the leading suppliers of natural and organic chicken products to the United States natural retail, gourmet specialty and foodservice markets. We are an independent operating business unit of The Hain Celestial Group, who is one of the leading natural and organic food and personal care products companies in the world.

The current definition of natural is inadequate from our perspective. We believe that in order to be credible the USDA's definition must relate to the manner in which the live stock was raised and the consumers expectation of the same. Today's consumers and the trade (retail and foodservice decision makers) are confused because of the inconsistency and interpretation of what natural means. There are too many inconsistencies between the AMS, FSIS and FDA on what classifies a product to be eligible for the label of natural. We believe it is critical for consistency in definition and interpretation between the AMS, FSIS and FDA going forward and further, there must be a connection of defining natural raw materials from conception to consumption.

The following are critical points we believe that both the AMS and FSIS must take into full consideration before a ruling is made:

- Our definition of natural is: Meat and poultry raised without the use of antibiotics (never used at any time during the animals life), 100% vegetarian fed (no protein or animal by-products), no hormones or growth promotants and raised humanely on family farms and ranches that practice sustainable agriculture methods and not from animals or poultry that have been cloned or genetically engineered.
- The criteria for determining if a meat or poultry product is natural must take into consideration all phases of the span of animal production from conception to consumption. The live definition of natural must have a direct connection to the packaged definition of products claiming to be natural.
- The term natural should only be applied if the meat or poultry going into the finished package can meet the natural definition above – no exceptions.
- All meat and poultry products should be source verified from birth to box. Products that cannot meet this requirement should not be allowed to be called natural.
- Ingredients that are defined as acceptable by the National Organic Program (NOP) (as specified in 7CFR 205) should be allowed to be used and labeled as natural on products meeting the natural requirements that we, the natural meat/poultry industry, have presented. Also any cooking and meat/poultry preparation methods that are acceptable in the NOP requirements should be allowed.
- Ingredients that are altered from their original natural state should not be allowed to be included in a cooked or further processed product that is called natural, as we are defining it. No irradiated ingredients or meats should be allowed.
- Raw meat and poultry that is enhanced with phosphate and water **should not be allowed to carry the natural claim.**

Companies that utilize antibiotics, hormones or animal by-products in the production of their meat and poultry products should not be allowed to put the term natural on their fresh or processed meat and poultry products.

Our definition of natural will only enhance and strengthen the United States perception and position in foreign countries where our meat and poultry products are sold. The United States will benefit for taking the high road to redefine natural to comply with how the natural and organic industry define it.

We, also, believe that more time is needed to digest the feedback and input from industry and consumers before making a new law on how natural will be defined.

On behalf of Hain Pure Protein Corporation I want to thank the AMS for taking a proactive stance to engage trade and consumer feedback on this very important subject. Thank you for your consideration.

Sincerely,

Joseph A. DePippo
President
Hain Pure Protein Corporation